

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 23-CR-315(1)(SRN/DTS)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
 vs.) **DEFENDANT MALDONADO-BENITEZ**
) **MOTION FOR EXTENSION TO FILE**
 ISRAEL MALDONADO-BENITEZ,) **REPLY**
)
 Defendant.)

Defendant moves this Court for an order extending the deadline to respond to Sealed Motion by USA (ECF 90) to November 27, 2024 at Noon.

On November 13, 2024 the government filed a sealed motion that will be dispositive of this matter. See ECF 90. On November 14, 2024 this Court issued an order directing Counsel to file a reply to the Government’s motion by 12:00 p.m. Wednesday, November 20, 2024. Counsel will be in trial during the week of November 18, 2024 in Fergus Falls, MN regarding *United States v. Patel*, 22-cr-00040 (1) (JRT-LIB).

Counsel has sought the Government's position on this extension, and not yet received a reply. Counsel for co-defendant Vannesa Violante-Lujano is unavailable until Monday November 18, 2024 and therefore has not been consulted on this motion for an extension.

Respectfully submitted,

Dated: November 15, 2024

/s/ Thomas C. Plunkett

Thomas C. Plunkett
Attorney No. 260162
Attorney for Defendant
101 East Fifth Street
Suite 1500
St. Paul, MN 55101
Phone: (651) 222-4357
Fax: (651) 297-6134
Email: tcp@tp4justice.com